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September 16, 2017 14:30 ET

HURRICANE IRMA MANAGEMENT REPORT

Information contained in this report reflects HQ and regional reporting from the most recently completed operational period as well as other reports provided by HQ, regional and interagency sources.

National Incident Management Objectives

Objective 1: Ensure that health and safety of the EPA response is considered at all times.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, aggressive and well-coordinated manner.

Objective 3: Ensure prompt Review and Processing of Fuel Waiver requests.

Objective 4: Prepare for and provide Rapid Assessment of Industrial facilities as requested by the State or under EPA's statutory program responsibilities for CERCLA Superfund, RMP and FRP facilities. Working with our state partners, contact industrial sources within the impacted area to determine their operational status and determine what support can be provided with the monitoring of the start-up of industrial sources.

Objective 5: Prepare for and provide Rapid Assessment & Technical Assistance Drinking Water & Wastewater facilities as requested by the State or local government. EPA will support our state partners in contacting drinking water and waste water systems.

Objective 6: Prepare a Sustained Response Plan that outlines the resource and equipment needs for a long duration response.

Objective 7: Activate the Agency's Crisis Communication Plan to insure effective and efficient coordination of all incident communications.

Objective 8: Encourage a collaborative federalism approach, where national, state and local governments interact cooperatively and collectively to solve common problems.

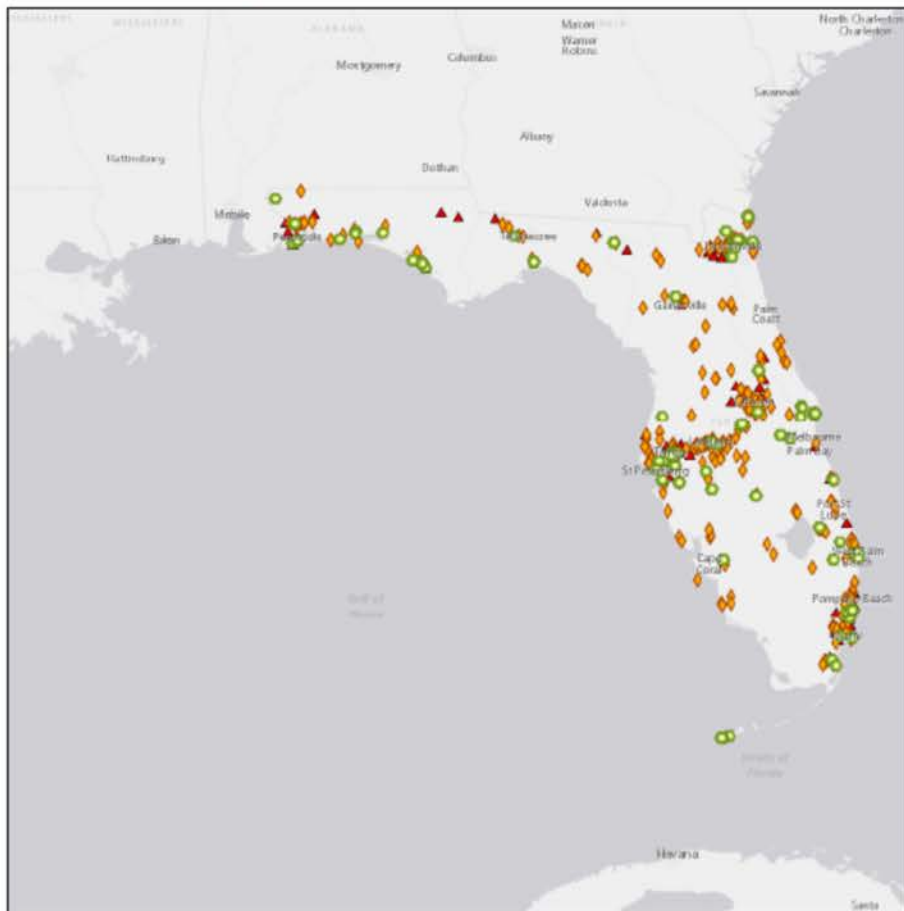
Objective 9: Begin Agency internal and external coordination, under the National Disaster Recovery Framework, regarding Recovery Support Functions in which EPA is likely to be involved.

Executive Summary

- SCP Distributors (a pool chemical company) from Naples, Florida reported a 1,000 gallon release of 12.5% sodium hypochlorite onto the ground with an unknown amount reaching a drainage ditch to the National Response Center (NRC). A Florida Department of Environmental Protection (FDEP) assessment team was dispatched on September 15 and will provide oversight of the cleanup.
- On September 13th, EPA issued a letter to the FDEP providing certainty to FDEP that EPA will not pursue enforcement action over post-Irma storm water discharges at facilities with National Pollution Discharge Elimination System (NPDES) permits. The press release and correspondence are available at: <https://www.epa.gov/newsreleases/epa-provides-certainty-florida-dep-over-stormwater-discharges-facilities-impacted>.
- The Florida State Emergency Operation Center (FSEOC) is assessing 194 priority facilities. The list is composed of a combination of facility types (e.g., Facilities Response Plan and Risk Management Plan).
- As of September 15th, EPA Region 4 has contacted a total of 252 RMP facilities in Florida. The LeHigh Acres Water Treatment Plant, which notified during the last reporting period that a 200-gallon release of a chlorine-water mixture occurred, was determined to not be an RMP facility. However, this facility has been assigned to the assessment task force for follow up. All other facilities contacted indicated that they had no known releases.
- EPA teams have assessed a total of 154 of the 168 National Priorities List (NPL) sites in Florida, Alabama, Georgia and South Carolina. A tear in the geo-membrane cap at one site, Post and Lumber in Quincy, Florida was identified. The Site RPM is working with a contractor to assess the extent of the damage and whether a patch might be sufficient. Minor damage was identified at the Terry Creek Site in Georgia. The Responsible Party is working to acquire contractor resources to address these issues. Drums identified on three NPL sites in Broward County were assessed for removal on September 15 and are being scheduled for pick up.

The maps below, from left to right are from the Region 4 Situation Report (09:41 ET, September 16th) and NOAA's website (05:00 ET, September 14th) and represent priority sites and potential for continued flooding.

Hurricane Irma Emergency Response - FRP and RMP facilities and NPL Sites



September 12, 2017

Priority_Facilities

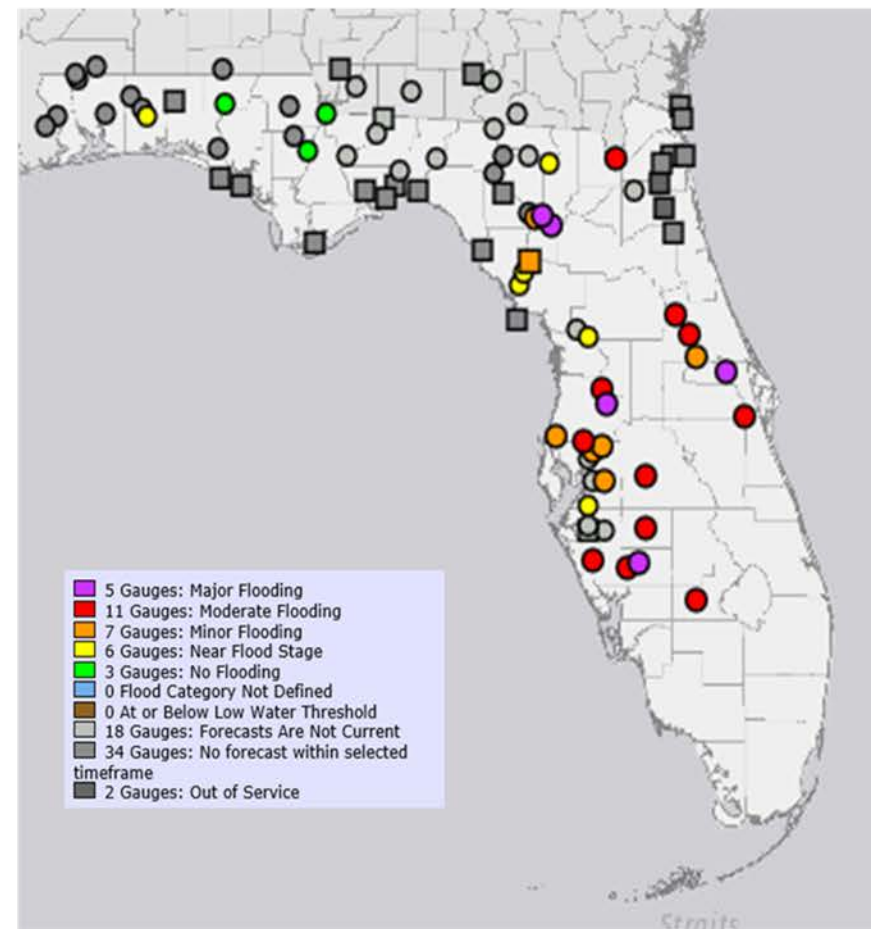
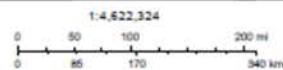
FRP

Priority_Facilities

RMP

Priority_Facilities

Superfund NPL



- 5 Gauges: Major Flooding
- 11 Gauges: Moderate Flooding
- 7 Gauges: Minor Flooding
- 6 Gauges: Near Flood Stage
- 3 Gauges: No Flooding
- 0 Flood Category Not Defined
- 0 At or Below Low Water Threshold
- 18 Gauges: Forecasts Are Not Current
- 34 Gauges: No forecast within selected timeframe
- 2 Gauges: Out of Service

Regional Mission Assignments and Funding

EPA Region	Mission Assignment Number	Funding Amount	Description of Assignment
Region 2	VI-17090102-EPA-01	\$10,000	ESF-10 support of the FEMA's RRCC in Colts Neck, NJ
	4335DR-VI-EPA-01	\$100,000	Activate EPA to FEMA R2 RRC in Colts Neck, NJ to support FEMA response ops
	3383EM-VI-EPA-01	\$75,000	Activate EPA to FEMA RRCC, JFO, EPA REOC, State EOC, PDA and NRA Teams and other coordination venues to support FEMA response ops in VI
	4335DR-VI-EPA-02	\$508,000	To perform assessment of oil and hazardous materials releases, contaminated debris and other environmental events following landfall in USVI
	4335DR-VI-EPA-04	\$10,000,000	Conduct oil and hazardous materials field operations, including cleanup and disposal of hazardous materials and oil, and response to orphaned containers in order to mitigate actual and potential threats to public health and safety.
	PR-17090102-EPA-01	\$20,000	Activate EPA to FEMA R2 RRC and other locations as necessary for PR (pre-landfall)
	3384EM-PR-EPA-01	\$75,000	Activate EPA to FEMA R2 RRCC, EPA REOC, State EOC, JFO, PDA, and RNA Teams and other coordination venues to support FEMA response in PR
	3384EM-PR-EPA03	\$508,000	To perform assessment of oil and hazardous materials releases, contaminated debris and other environmental events following landfall in PR
	4336DR-PR-EPA-01	\$100,000	Activate EPA to FEMA R2 RRCC and other EOCs
Region 4	4337DR-FL-EPA-05	\$90,000	Activation for appropriate EPA personnel to perform the functions of ESF 10 in the RRCC, IOF, JFO, Incident Management Assistance Team (IMAT), Preliminary Damage Assessment (PDA) Team, or other teams and locations, at the direction and coordination of FEMA.
	4337DR-FL-EPA-03	\$525,000	Activate Federal Hazardous Assessment Response Team w/appropriate resource support to conduct assessments at hazardous substances within R4
	4337DR-FL-EPA-04	\$9,000,000	Provide oil and hazardous material field response in support of FEMA response operations providing specialized expertise, conducting damage assessment of oil/hazmat waste impact evaluating hazards; and/or response, removal, or disposal of: actual and potential oil discharges, and releases of hazardous substances, pollutants and

			contaminants and remove pollutants from vessels in or upon navigable waters and adjoining shorelines.
	FL-17083101-EPA-01	\$35,000	Activate Environmental Protection Agency (EPA) ESF-10 support to the FEMA Region IV Regional Response Coordination Center (RRCC)
	3385EM-FL-COE-SAD-10	\$150,000	Federal Operations Support
	4335DR-VI-EPA-06	\$2,000,000	EPA provides support preparing for site -specific platforms for situational awareness; environmental data management; operational deployment plans; documentation of assessment activities and results; resource and financial tracking, accountability and cost documentation.
Total	\$23,196,000.00		

Number of Regional Personnel Involved in Response

Type	R2 Personnel	R4 Personnel	Total Regional Personnel
EPA	84	52	136
Contractors	22	14	36
Totals	106	66	172

Emergency Response

Daily/Cumulative Summary of Hazard Evaluations/Recovery				
Status	Opened		Closed	
	9/15/2017	Cumulative	9/15/2017	Cumulative
Puerto Rico	0	7	0	7
U.S. Virgin Islands	1	2	0	0
Note: Open means that the target is yet to be recovered. Closed means the target was recovered, left in place, or access was denied to collect the item.				

Daily/Cumulative Summary of Spills/Discharges				
Status	Opened		Closed	
	9/15/2017	Cumulative	9/15/2017	Cumulative
Puerto Rico	1	2	0	0
U.S. Virgin Islands	1	1	1	1

Region 2 Significant Activities

- EPA Region 2 (R2) was activated by FEMA to respond to Hurricane Irma's impacting the USVI and Puerto Rico. EPA is part of Emergency Support Function-10 (ESF-10) and EPA personnel have deployed to St. Thomas, St. Croix and St. John in the USVI, and Puerto Rico, including the islands of Vieques and Culebra.
- The R2 REOC is activated with an Incident Command System (ICS) structure in place. R2 has activated the Regional Incident Coordination Team (RICT).
- R2 EPA and contractor personnel teams have deployed to both Puerto Rico and the USVI. Teams will focus on assessing any immediate threats from hazardous substance releases and oil spills, orphan hazardous containers, household hazardous waste, contaminated debris, and drinking water/wastewater (DW/WW) issues. USVI Waste Management Authority (USVIWMA) issued a notice to residents in St. Thomas to bring debris to landfills. Five debris staging sites have been identified.
- EPA assessment teams have completed their assessments of Superfund and oil sites in Puerto Rico and in the U.S Virgin Islands with the exception of two sites.
- EPA Criminal Investigation Division (CID) and National Criminal Enforcement Response Team (NCERT) special agents were deployed to the USVI to provide law enforcement support to EPA R2 On-Scene Coordinators (OSCs) conducting environmental assessments.
- EPA OSCs are conducting field assessments in Puerto Rico. OSCs are also mobilized to the USVI to conduct environmental assessments.
- EPA is conducting debris assessments and coordinating with USACE, FEMA, and the USCG to develop debris plans with Puerto Rico and USVI. Debris Assessment Teams were deployed in both Puerto Rico and the USVI. In addition, the teams continue to focus on assessing potentially contaminated debris at oil and chemical fixed facilities.
- EPA is starting to move contractor resources into the USVI but logistics remain a challenge. EPA is pursuing berthing arrangements on the SS Wright. Vessel's berthing is currently overbooked. The vessel was due into St. Thomas September 15th.
- EPA is moving resources into the USVI to conduct oil and hazardous materials field operations, including cleanup and disposal of hazardous materials and oil, and response to orphaned containers.
- EPA continues to perform assessment work on St. Thomas. Five potential debris/waste collection areas have been identified. None have been set up as of September 15th. EPA is coordinating with the USACE regarding the debris collection areas and logistics.

Superfund and Oil Sites

EPA assessment teams have completed their assessments of Superfund and oil sites in Puerto Rico and in the USVI with the exception of two sites below.

- Guayanilla Bay (PR) oil spill is a sub-surface oil plume that has discharged oil through a storm sewer line in the past. The storm sewer has been secured as part of the original oil spill response. No oil spills have been reported from this site.
- The Cruz Bay Oil Tank (St. John) site involves an oil storage tank where the oil has been removed with the exception of oil sludge in the bottom of the tank. The tank was damaged during the storm but overflights of the area have not shown any oil spills from the site. The site will be addressed once access is possible.

SUPERFUND SITES (NPL, Removal and Oil)						
Puerto Rico						
Site	Type	Phase 1	Phase 2		Phase 3	All Phases Completed
		Post-Storm Assessment	Site Inspection Needed	Inspected	Additional Response Action	
Guayanilla Bay Oil Spill*	Oil Response	-----	No	N/A	No	-----
U.S. VIRGIN ISLANDS						
Cruz Bay Oil Tank**	Oil Response	09/11/17	Yes	video	No	-----

*Guayanilla Bay Oil Spill is a pre-storm OPA remediation site being addressed by an OSC.

**Cruz Bay Oil Tank is a pre-storm OPA remediation site being addressed by an OSC. Recent amateur video shows this tank has partially collapsed onto itself, but there was no release because the contents are semi-solid.

Regulated Facilities

PUERTO RICO

Facility Type	Sites Identified	Pre-Storm Remote Assessment	Post Storm Remote Assessment	Post Storm Field Assessment	Follow-up Action Required
RMP	56	56*	56^	5	0
FRP	22	22*	22^	3	0
SPCC (non-FRP) [‡]	232*	232**	30 [°]	1	0
Total	310*	310*	108[°]	9	0

* Pre-Hurricane email requested facilities to self-identify any pre-existing compromised conditions (construction at process areas, tank maintenance, etc.). No facilities reported pre-existing compromised conditions.

^ Based on Post-Hurricane oil spill/chemical release/damage assessment email and phone calls. No facilities have reported oil spills, chemical releases, or upset/damage conditions that could lead to oil spill or chemical release.

* This number reflects the number of known non-FRP SPCC facilities believed to be active.

U.S. VIRGIN ISLANDS

Facility Type	Sites Identified	Pre-Storm Assessment	Post Storm Assessment	Post Storm Field Assessment	Follow-up Action Required
RMP	1	1*	1 [°]	1	0
FRP	6	6*	6 [°]	2	0
SPCC (non-FRP) [‡]	57*	57**	10 [°]	16	0
Total	64*	64*	17[°]	19	0

* Pre-Hurricane email requested facilities to self-identify any pre-existing compromised conditions (construction at process areas, tank maintenance, etc.). No facilities reported pre-existing compromised conditions.

^ Based on Post-Hurricane oil spill/chemical release/damage assessment email and phone calls. No facilities have reported oil spills, chemical releases, or upset/damage conditions that could lead to oil spill or chemical release.

‡ There is no SPCC submission requirement. This number reflects the number of known non-FRP SPCC facilities that are believed to be active based on inspection history.

‡ Efforts shifted on 9/13/17 to focus on facilities on St. Thomas and St. John

Drinking Water / Wastewater (DW/WW) Assessments

Puerto Rico Drinking Water Status: PRASA is back to normal operations in providing drinking water services to the population. This does not include the non-PRASA systems which account for 4% of the PR population but as explained below non-PRASA systems have not suffered serious damages.

PRASA: All PRASA waste water treatment plants are in service. CEPD continued inspections of Sanitary Pump Stations in PRASA's North Region on Sept 14th and the Culebra WWTP. Inspections performed indicated that there are no major issues at the facilities. The only remaining inspections are for 5 pump stations in PRASA's East Region that should have been conducted on September 15th and the Vieques WWTP which will be done September 19th.

PREPA: 99% of the population is expected to have power by September 15th; all PREPA wastewater treatment plants are in service.

Non-PRASA Drinking Water Status: CEPD and PRDOH contacted most of the non-PRASA systems between September 12th and 13th. Non-PRASA systems did not identify major problems. The systems did not have service due to the lack of primary power. CEPD believes that there is no need to conduct assessments at the non-PRASA systems, since they didn't find any major problems.

USVI Drinking Water Status: On September 11th, VIWAPA started operating the Reverse Osmosis (RO) plant in St. Thomas for WAPA distribution. WAPA previously used desalination but has switched to RO. A boil water notice was issued for Saint Thomas and Saint John. The chlorination system is up and running. CEPD just requested assistance from the EPA OSCs stationed in Saint Thomas to conduct assessments of drinking water providers. CEPD staff is available upon request to help conduct assessments.

USVI Wastewater: According to a report provided by Waste Management Authority, 6 of the 8 municipal wastewater treatment plants are in service. The only facility not in service is Vessup in Saint Thomas, and the assessment of the George Simmonds WWTP has not been completed due to lack of access. In addition, WMA indicated that 4 of the 15 sanitary pump stations in Saint Thomas and Saint John are not in service. During a conversation held with DPNR on September 12th, DPNR stated that they will request assistance from EPA to conduct assessments at the TPDES facilities in Saint Thomas and Saint John. On September 13th, CEPD requested the OSCs deployed in St. Thomas to assess the wastewater treatment plants and pump stations in Saint Thomas and Saint John. CEPD staff is available upon request to help conducting assessments.

Region 4 Significant Activities

- The EPA Region 4 Incident Commander has established incident command in St. Petersburg, Florida. Assessment teams met with eight county Emergency Management Agency managers and county fire officials and have reported no ongoing releases or threats of releases. They made no requests for additional ESF #10 assistance.
- The State of Florida identified 213 targets for field assessment for hazardous material and/or oil related issues. As of September 16th, all 210 EPA-assigned assessments have been completed.

Superfund and Oil Sites

- The R4 Emergency Response program coordinated the removal of three drums at Anodyne, Inc. Superfund Site containing Investigation Derived Waste (IDW) generated during a recent sampling event.
- On September 13th, the R4 SFD group deployed six teams to Florida, Georgia, South Carolina and Alabama to conduct rapid assessment at all NPL sites within the State (see table below). Two sites require follow-up:
 - Fairfax Wood Treating, Jacksonville: Due to heavy rain, some runoff concerns were identified at an on-site retention point, and a washout underneath some site fencing. Crews are being mobilized to address the washout and samples that will be collected from the pond to determine whether contamination issues are present/absent.
 - US Navy Air Station Cecil Field, Jacksonville: Due to flood, the air-sparging unit had a compressor failure; a contractor is currently working to repair the unit.

Region 4 Superfund Team Deployment		
States to be Assessed	Total Sites to be Assessed	Sites Completed
Florida	93	82
Georgia	22	22
South Carolina	36	35
Alabama	17	15
Totals	168	154

Drinking Water / Wastewater (DW/WW) Assessments

- The EPA R4 WPD received funding totaling \$75,000 under an ESF-3 MA sub-task to support the USACE drinking water and wastewater facility assessments. The request specified providing three technical experts for 14 days. WPD teams in Tallahassee are conducting assessments.
- GAEPD regional offices are making calls to water facilities and reporting this information to the state ESF-3 desk.
- The WPD compiled an inventory of community drinking water systems (CWS) and publicly owned wastewater treatment plants (POTW) to be used for post-storm damage assessment within R4.
- The EPA continued to coordinate with the FDEP and the USACE relative to Water and drinking water issues. Additionally, the USACE has indicated they may request R4 assistance with sampling activities associated with bringing the water/ drinking water facilities back on line.
- Initial reports from Georgia water and wastewater systems indicate that six community-water systems are without power or on back-up generators. Three Publically Owned Treatment Works (POTW) are reported as being without power or partially operating on back-up generators. Approximately 10 counties are under a boil advisory.
- Water team is assisting USACE ESF-3 and FL with refining data in the state's Storm Tracker system which tracks the operational status of drinking water and wastewater systems. R4 Water received BWN information from Georgia late on the afternoon of September 14th.
- In Florida, thirty-five (35) community water systems are currently on boil water notices with twenty-two (22) community water systems reporting loss of pressure or being without power
- EPA R4 WPD compiled an inventory of community drinking water systems (CWS) and POTW that may be used during post storm damage assessment in Florida.

Regulated Facilities

- Georgia Environmental Protection Division (EPD) notified Region 4 that the 275 RMP facilities in Georgia have not been impacted. In addition, Alabama Department of Environmental Management (ADEM) notified Region 4 that the 195 RMP facilities in Alabama have not been impacted.

Table 4 Priority Facility Sites in Florida				
Drinking Water	WWTP	NPL	RMP	FRP
1,641	386	90	263	122

Notes:

WWTP – Wastewater Treatment Plant

NPL – National Priority List sites

FRP – Facility Response Plan facilities

RMP – Risk Management Plan facilities

EPA Headquarters Significant Activities

The HQ EOC is activated to Level 1 in support of EPA Region 2 and Region 4 responses to Hurricane Irma. The HQ EOC is coordinating on several levels with EPA Region 2, EPA Region 4, and other Federal agencies. The HQ EOC has deployed personnel to the FEMA NRCC to staff the ESF #10 desk. EPA Senior Management that comprise the Policy Coordination Committee (PCC) developed and issued senior management objectives that form the basis of field strategy and tactics in response to Irma.

Personnel	AO	OAR	OARM	OCFO	OCSPP	OECA	OEI	OGC	OLEM	OP	ORD	OW	ATSDR	Totals
Employees	0	0	1	0	0	2	1	1	14	1	1	1	1	23
Contractors	0	0	0	0	0	0	3	0	3	0	0	0	0	6
TOTAL	0	0	1	0	0	2	4	1	17	1	1	1	1	29

Other EPA Activities

Fuel Waivers: EPA continues to review requests for fuel waivers as needed. On September 13th EPA approved a request from the State of Texas to continue to waive requirements for fuels in Texas through the end of the month to help address the emergency circumstances in Texas from Hurricanes Harvey and Irma.

OECA Civil/CID:

- On September 13th, EPA issued a No Action Assurance letter to allow Duke Energy diesel reserves to be used for on-road response vehicles where the engines have been certified that this fuel will not cause damage. The NAA is issued through September 22nd.
- On September 10th, EPA issued a NAA letter for all Florida Power Plant facilities in response to the emergency request for Hurricane Irma

related relief. EPA will exercise its discretion not to pursue enforcement for violations of Title V and/or NPDES permit requirements at electric generating units located in the State of Florida. The NAA terminates at 23:59 on September 26th.

- Twelve EPA CID and NCERT special agents arrived in St. Croix. The team received an assignment from the Region 2 IC to support assessment efforts at St. Thomas on September 14th and 15th. A portion of the team will remain in St. Croix on September 15th to continue LEO liaison and collect additional intelligence on condition at St. Thomas and St. John from emergency responders. They will identify transportation options to and from St. Thomas and St. Johns for future assessment support assignments as required.

Communications:

- On September 15th, EPA issued a press release update on Agency activities related to Hurricane Irma response efforts, it is available at: <https://www.epa.gov/newsreleases/epa-irma-update-friday-september-15-2017>
- The HQ EOC Public Information Office is working with OLEM to develop fact sheets to inform people about issues related to returning after the storms. Topics covered include: household hazardous waste, construction debris, etc.
- Two Community Involvement Coordinators (CIC) deployed to PR on September 11th, and two CICs deployed to the USVI on September 12th.
- The Hurricane Irma website is live at <https://www.epa.gov/hurricane-irma>.